

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

THE HIPSAVER COMPANY, INC.,	)	
	)	Civil Action No. 05-10917 PBS
Plaintiff,	)	
	)	
v.	)	
	)	
J.T. POSEY COMPANY,	)	
	)	
Defendant.	)	
	)	
AND RELATED COUNTERCLAIM.	)	
	)	

**FURTHER STIPULATION AND REQUEST FOR ORDER RE  
DEFENDANT'S RESPONSE TO PLAINTIFF'S FURTHER MOTION TO  
COMPEL IMMEDIATE PRODUCTION OF DOCUMENTS AND  
INFORMATION IN RESPONSE TO ITS SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS**

Plaintiff The HipSaver Company, Inc. ("HipSaver") and Defendant J.T. Posey Company, Inc. ("Posey") through their respective attorneys, hereby stipulate as follows:

1. Plaintiff electronically filed and served its Further Motion to Compel Immediate Production of Documents and Information in Response to its Second Request for Production of Documents (the "Motion") on April 3, 2006 (Docket No. 113);
2. Defendant's deadline to file and serve its response to the Motion was originally April 17, 2006;
3. On April 13, 2006, counsel for Posey, Douglas H. Morseburg, was involved in an accident in which he suffered serious physical injuries;

4. As a consequence of the foregoing, the parties agreed that the time within which Posey would be required to file and serve its opposition to the Motion would be extended by one week, to and including, April 24, 2006, and a Stipulation reflecting said agreement was filed with Court on April 17, 2006.
5. On April 20, 2006, the Court issued an Electronic Order granting the extension to April 24, 2006.
6. Since the date of filing of the stipulation mentioned above, Mr. Morseburg has required additional physical treatment for the injuries he suffered on April 13, 2006.
7. As a consequence of the foregoing, the parties have agreed that the time within which Posey will be required to file and serve its opposition to the Motion will be extended by one additional day, to April 25, 2006, and they hereby request the Court to order that the deadline shall be extended accordingly.

Dated: April 24, 2006

J.T. POSEY COMPANY  
By its attorneys,

/s/ Douglas H. Morseburg  
Jeffrey G. Sheldon (CA Bar No. 67516)  
Douglas H. Morseburg (CA Bar No. 26205)  
SHELDON & MAK PC  
225 South Lake Avenue, Suite 900  
Pasadena, CA 91001  
(626) 796-4000

Anthony J. Fitzpatrick (BBO # 564324)  
DUANE MORRIS LLP  
470 Atlantic Avenue, Suite 500  
Boston, MA 02210  
(617) 289-9200

Dated: April 24, 2006

THE HIPSAVER COMPANY, INC.  
By its attorneys,

/s/ Edward J. Dailey  
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Lee Carl Bromberg (BBO No. 058480)  
Edward J. Dailey (BBO No. 112220)  
Courtney Meehan Quish (BBO No. 662288)  
BROMBERG SUNSTEIN LLP  
125 Summer Street – 11<sup>th</sup> Floor  
Boston, Massachusetts 02110-1618  
(617) 443-9292